

Internal Audit Department

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Ross L. Tate County Auditor

Sheriff's Office Training Division

April 2013

Internal Audit Report Authorized by the Maricopa County Board of Supervisors

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Audit Objectives

To determine that MCSO:

- Sworn officer training complies with requirements mandated by Arizona Peace Officer Standards and Training (AZPOST) and state statutes.
- Detention officer training complies with requirements mandated by Department of Justice and MCSO policies.
- Critical policy-related training conforms to MCSO and industry standards.
- Access to system applications is appropriately restricted.

Scope

This audit primarily focused on training that is the responsibility of the MCSO Training Division. The testing period was FY 2010 to FY 2012. To perform this audit we interviewed 15 MCSO employees and toured MCSO detention facilities and firing range. We then reviewed MCSO's:

- Training activity and claims data
- Policies and compared them to federal and state regulations
- Training courses, including lesson plans
- Training application systems access and security

Standards

This audit was approved by the Board of Supervisors and conforms to International Standards for the Professional Practice of Internal Auditing. The specific areas reviewed were selected through a formal risk-assessment process.

Audit Team

Deputy County Auditor Eve Murillo, CPA, MBA, CFE, ITIL Audit Supervisor Toni Sage, MBA, CGAP, CLEA Senior IT Auditor Susan Adams, MBA, CISA, ITIL, CLEA Senior Auditor Scott Jarrett, CIA, CGAP, CLEA MGT of America

This report is intended primarily for the information and use of the County Board of Supervisors, County leadership, and other County stakeholders. However, this report is a matter of public record, and its distribution is not limited.

We have reviewed this information with Sheriff's Office management. The Action Plan was approved by Jerry Sheridan, Chief Deputy, on April 15, 2013.

If you have any questions about this report, please contact Eve Murillo, Deputy County Auditor, at 602-506-7245.

Audit Results

Issue #1: Arizona Peace Officer Standards and Training (AZPOST)

Observation: We reviewed 66 (10%) of MCSO sworn officer training records for compliance with AZPOST requirements, including firearms qualifications. All officers in our sample complied with AZPOST requirements.

Conclusion #1: Controls are sufficient to ensure sworn officers are complying with AZPOST training requirements.

Recommendations	MCSO Action Plan
None	N/A

Issue #2: Detention Officer Training

Observation: We reviewed 3 years of training documents for 62 detention officers and found that 97% received credit for the required courses. However, detention officers received credit for online courses even when course material was not reviewed and training time was a fraction of the awarded credit hour. The Training Division monitors training compliance through test results, rather than time spent on training materials as stipulated by policy and regulation. In addition, in-person training courses for Respirator Fit Test and Cardiopulmonary Resuscitation (CPR) were not completed timely, causing officer certifications to lapse. We also noted inconsistencies in training requirements within MCSO policies, memoranda, and training schedules.

We compared MCSO Training Division tracking reports to supporting attendance records and found that MCSO did not maintain 2010 rosters as required by policy and records retention standards.

We reviewed a sample of field training records and found that academy graduates completed MCSO's field training program requirements. However, the evaluation and documentation processes were inconsistent.

Conclusion #2A: Controls over mandatory detention officer training need strengthening.		
Recommendations	MCSO Action Plan	
2A-1 Develop tracking procedures that identify training noncompliance; respond timely to identified exceptions.	Concur – completed	
	Tracking procedures for non-compliance with mandatory training are already in place and being used through Skills Manager.	
2A-2 Clarify training requirements in training policies, manuals, and memoranda and ensure they are consistently communicated.	Concur – completed	
	Training requirements, as listed in policy, employee manuals, and memoranda, are currently being communicated with all Sheriff's Office employees. The Training Division will continue to work to ensure this communication is timely, consistent, and clearly detailed.	
2A-3 Maintain employee training records according to record retention laws and standards.	Concur – completed	
	2010 rosters were prepared and stored, however due to an unknown error these records were misplaced after having been stored in the Sheriff's Warehouse. Going forward these records will be retained on site at Training for three years in order to maintain better controls. All other records are still available.	
Conclusion #2B: Controls over online training need improvement.		
2B-1 Establish procedures to ensure that awarded credit hours are compatible with MCSO policies and regulations.	Concur – completed	
	The assurance of awarded credit hours remaining compatible with MCSO Policy is being done through an improved use of Skills Manager, in addition to checks and balances put into place by the current Training Compliance Supervisor.	

Recommendations	MCSO Action Plan	
2B-2 Document and implement procedures to track and monitor time spent on E-Learning courses.	Partially Concur – management accepts the risk of this issue	
	Detention E-Learning is not video based. It is PowerPoint based and students are required to read material. There are no existing elements in this type of training to measure time spent in any given course. However, the Sheriff's core training has migrated toward hybrid classes where students attend live courses and then must complete a test on the E-Learning system prior to receiving credit for the course.	
	Target Date: 7/01/2013	
2B-3 Review and update current training programs and procedures to ensure consistency.	Concur – in process	
	In compliance with the Sheriff's Office Integrity, Accountability, Community (IAC) Initiative, all lesson plans will be reviewed for accuracy and updating annually. This will be the responsibility of the Curriculum Coordinator with assistance from Training staff. All reviews will be documented and previous lesson plans will be electronically archived for reference.	
	Target Date: 12/31/2013	
Conclusion #2C: Field Training Pro	ogram requirements are being met.	
2C None	N/A	
Conclusion #2D: Field Training Program uniformity needs improvement.		
2D Establish uniform field training	Concur – in process	
procedures for critical skill sets.	Training staff is currently working on restructuring the Basic Training Program as outlined in Sheriff's Policy GG-1. The Training Division will be providing Field Training Officers (FTO's) with improved guidance on completing evaluations and documentation for the Sheriff's Field Training Requirements. Standardized forms will be utilized and a training template prepared, outlining required documentation from each FTO. Target Date: 12/31/2014	

Issue #3: Training Plan Development

Observation: We reviewed the lesson plans and associated policies for a sample of 17 courses related to critical areas: Use of Force, Emergency Pursuit Driving, and Medical Needs. We did not find any instances where training materials were in conflict with the underlying policies. However, we identified one out-of-date policy and found a lack of uniformity in lesson plan development, documentation, and retention.

The Training Division is not analyzing Use of Force or Pursuit Reports, as required by MCSO policy and does not consistently provide additional training to officers involved in multiple accidents.

Use of out-of-date policies, inconsistencies in lesson plan development, and lack of remedial training could impact safety and lead to higher legal costs.

Conclusion #3A: Training materials agreed with policies.		
Recommendations	MCSO Action Plan	
None	N/A	
Conclusion #3B: Training plan development could be improved.		
3B Expand the MCSO Training Administration Policy to address development of annual and lesson plans, incorporation of significant changes in laws and regulations identification, and retention of documents.	Concur – in process All lesson plans will be reviewed for accuracy and updated annually. This will be the responsibility of the Curriculum Coordinator with assistance by training staff. All reviews will be documented and previous lesson plans will be electronically archived for reference. Target Date: 12/31/2013	

Conclusion #3C: Incident data assessment needs strengthening.	
Recommendations	MCSO Action Plan
3C-1 Establish a procedure for routing and tracking use of force and pursuit incidents to the Training Division.	Concur – implementation not currently possible With the upgrade and implementation of the new Intergraph CAD/RMS software, this process will be automated. Target Date: Implementation date for the new software is approximately October 2013.
3C-2 Establish policies and procedures to ensure claims data is used in training plan development and remedial training.	Concur – in process The Training Division is working with County Risk Management to establish an online link for accessing claims data in real time to establish patterns and trends that can be mitigated by training. This data will be utilized to determine both training development and remediation as needed for employees. Target Date: 12/31/2013

Issue #4: Information Technology

Observation: MCSO's Training Division has two primary computer applications: Skills Manager, a database of employees' training activities, and E-Learning, an online training system. We reviewed user access for 27 (100%) Skills Manager accounts, 25 (100%) E-Learning administrator accounts, and 25 (12%) terminated employee accounts. We also reviewed physical security of technology resources, and disaster recovery planning. We found that:

- Controls exist for securing terminated employee user accounts, physically securing the E-Learning server, and backing up computer applications and data.
- Policies and procedures over user access management for Skills Manager and E-Learning applications are not written or approved.
- Multiple employees use generic user accounts.
- The Skills Manager application server is not in a secure location.
- A disaster recovery plan does not exist.

Conclusion #4A: Controls exist for securing terminated employee user accounts, physically securing the E-Learning server, and backing up computer applications and data		
Recommendations	MCSO Action Plan	
None	N/A	
Conclusion #4B: User access controls over key computer applications need strengthening.		
4B-1 Establish written policies and procedures over user access management for the Skills Manager and E-Learning applications.	Concur – completed The MCSO Training Division approved a written policy for user access management. Completion Date: 1/14/2013	
4B-2 Review all user access accounts and eliminate generic user accounts; create individual user accounts whenever practical.	Concur – completed MCSO reviewed all user access and eliminated generic user accounts for daily use. The generic accounts are now used as a report template repository, and are restricted and made available to selected admin staff for reference only.	
	Completion Date: 3/06/2013	
Conclusion #4C: Physical security and disaster recovery planning need improvement.		
4C-1 In conjunction with the MCSO Tech Bureau, identify and implement a feasible solution to ensure the Skills Manager server is properly secured.	Concur – implementation not currently possible The Training Division will move the Skills Manager server to the Sheriff's new data center once completed. The data center is projected to be completed late 2013. Target Date: 12/31/2013	
4C-2 Consult with the MCSO Tech Bureau to ensure that the Skills Manager and E-Learning applications are included in the disaster recovery plan being developed (as recommended in the FY 2012 MCSO Data Center Audit).	Concur – in process The Training Division will work with Sheriff's Technology Bureau to ensure that the Skills Manager and E-Learning applications are included in the disaster recovery plan being developed (as recommended in the FY 2012 MCSO Data Center Audit). Target Date: 12/31/2013	